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**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)  
ANTITRUST LITIGATION

Master File No. 07-CV-5944-JST

MDL No. 1917

This Document Relates to:

*ALL DIRECT PURCHASER ACTIONS*

**DECLARATION OF R. ALEXANDER  
SAVERI IN SUPPORT OF DIRECT  
PURCHASER PLAINTIFFS'  
ADMINISTRATIVE MOTION TO SEAL  
DOCUMENTS PURSUANT TO CIVIL  
LOCAL RULES 7-11 AND 79-5(d)**

1 I, R. Alexander Saveri, declare:

2 1. I am the Managing Partner of Saveri & Saveri, Inc., Lead Counsel for Direct  
3 Purchaser Plaintiffs (“DPPs” or “Plaintiffs”) in this action. I am a member of the Bar of the State of  
4 California and admitted to practice in the Northern District of California. Except as otherwise  
5 stated, I have personal knowledge of the facts stated below.

6 2. I make this Declaration in Support of Plaintiffs’ Administrative Motion to Seal  
7 Documents Pursuant to Civil Local Rules 7-11 and 79-5(d) whereby Plaintiffs move the Court for  
8 leave to file the following documents, or portions thereof, under seal:

- 9 • Gray highlighted portions of the Direct Purchaser Plaintiffs’ Application for  
10 Application for Default Judgment by the Court Against the Irico Defendants;
- 11 • Gray highlighted portions of the Declaration of R. Alexander Saveri in Support of  
12 Direct Purchaser Plaintiffs’ Application for Application for Default Judgment by the  
13 Court Against the Irico Defendants
- 14 • Exhibits A, D–P to the Declaration of R. Alexander Saveri in Support of Direct  
15 Purchaser Plaintiffs’ Application for Application for Default Judgment by the Court  
16 Against the Irico Defendants that contain quotations or information from documents  
17 that Defendants have designated “Confidential” or “Highly Confidential”;
- 18 • The Expert Report of Leslie M. Marx, Ph.D. that contains quotations or information  
19 from documents that Defendants have designated “Confidential” or “Highly  
20 Confidential”;;
- 21 • Expert Report of Jeffrey J. Leitzinger, Ph.D. dated November 6, 2014 that contains  
22 quotations or information from documents that Defendants have designated  
23 “Confidential” or “Highly Confidential”; and
- 24 • Expert Report of Jeffrey J. Leitzinger, Ph.D., dated September 1, 2016 that contains  
25 quotations or information from documents that Defendants have designated  
26 “Confidential” or “Highly Confidential”;;

27 3. On June 18, 2008, the Court approved a Stipulated Protective Order in this matter.  
28 ECF No. 306 (“Protective Order”).

1 Section 10 of the Protective Order requires that “a Party may not file in the public  
2 record in this action any Protected Material. A Party that seeks to file under seal any Protected  
3 Material must comply with Civil Local Rule 79-5.”

5. Plaintiffs seek to file the documents (or portions thereof) listed above in Paragraph 2 under seal pursuant to certain orders regarding the sealing of documents issued by this Court.

6. The documents (or portions thereof) listed in Paragraph 2 contain similar information to the documents that were ordered filed under seal by this Court in connection with Direct Purchaser Plaintiffs Motion for Class Certification that was filed on May 14, 2013. *See* Order Granting Direct Purchaser Plaintiffs' Administrative Motion to Seal Documents Pursuant to Civil Local Rules 7-11 and 79-5(d), ECF No. 1698 (May 29, 2013).

7. The documents (or portions thereof) identified in Paragraph 2 have been designated as confidential by the Chunghwa Defendants, the Hitachi Defendants, the LG Defendants, the Mitsubishi Electric Defendants, the Panasonic Defendants, the Philips Defendants, the Samsung SDI Defendants, the Thomson Defendants, and/or the Toshiba Defendants.

Document	Designating Entity
Gray highlighted portions of the Direct Purchaser Plaintiffs' Application for Default Judgment by the Court Against the Irico Defendants	Chunghwa Defendants, the Hitachi Defendants, the LG Defendants, the Mitsubishi Electric Defendants, the Panasonic Defendants, the Philips Defendants, the Samsung SDI Defendants, the Thomson Defendants, and the Toshiba Defendants.
Gray highlighted portions of the Declaration of R. Alexander Saveri in Support of Direct Purchaser Plaintiffs' Application for Default Judgment by the Court Against the Irico Defendants	Chunghwa Defendants, the Hitachi Defendants, the LG Defendants, the Mitsubishi Electric Defendants, the Panasonic Defendants, the Philips Defendants, the Samsung SDI Defendants, the Thomson Defendants, and the Toshiba Defendants.
Exhibit A to the Saveri Declaration: Expert Report of Leslie M. Marx, Ph.D.	Chunghwa Defendants, the Hitachi Defendants, the LG Defendants, the Mitsubishi Electric Defendants, the Panasonic Defendants, the Philips Defendants, the Samsung SDI Defendants, the Thomson Defendants, and the Toshiba Defendants.

Exhibit D to the Saveri Declaration: Expert Report of Jeffrey J. Leitzinger, Ph.D., dated November 6, 2014	Chunghwa Defendants, the Hitachi Defendants, the LG Defendants, the Mitsubishi Electric Defendants, the Panasonic Defendants, the Philips Defendants, the Samsung SDI Defendants, the Thomson Defendants, and the Toshiba Defendants.
Exhibit E to the Saveri Declaration: Expert Report of Jeffrey J. Leitzinger, Ph.D., dated Sept. 1, 2016	Chunghwa Defendants, the Hitachi Defendants, the LG Defendants, the Mitsubishi Electric Defendants, the Panasonic Defendants, the Philips Defendants, the Samsung SDI Defendants, the Thomson Defendants, and the Toshiba Defendants.
Exhibit F to the Saveri Declaration: CHU00030679–83	Chunghwa Defendants
Exhibit G to the Saveri Declaration: CHU000030688–91	Chunghwa Defendants
Exhibit H to the Saveri Declaration: CHU00030695–97	Chunghwa Defendants
Exhibit I to the Saveri Declaration: CHU00030819–33	Chunghwa Defendants
Exhibit J to the Saveri Declaration: CHU0029110–15	Chunghwa Defendants
Exhibit K to the Saveri Declaration: SDCRT-0087694	Samsung SDI Defendants
Exhibit L to the Saveri Declaration: SDCRT-0087700–02	Samsung SDI Defendants
Exhibit M to the Saveri Declaration: CHU00030067	Chunghwa Defendants
Exhibit N to the Saveri Declaration: CHU00123358–61	Chunghwa Defendants
Exhibit O to the Saveri Declaration: SDCRT-0091524–30	Samsung SDI Defendants
Exhibit P to the Saveri Declaration: CHU00102752–54	Chunghwa Defendants

8. A stipulation by the parties could not be obtained because under Civil Local Rule 79-5, parties may not stipulate to the filing of any document under seal. *See* Civil L.R. 7-11(a), 79-5(b).

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3rd day of August, 2017 in San Francisco, California.

/s/ R. Alexander Saveri

R. Alexander Saveri